

PIERCE BAINBRIDGE BECK PRICE & HECHT LLP

December 7, 2018

VIA ECF

Hon. Paul A. Crotty, United States District Judge
United States District Court
Southern District of New York
500 Pearl Street, Chambers 1350
New York, NY 10007

Re: *Robert C. Adler v. Payward, Inc. d/b/a Kraken*, 1:18-CV-08100-PAC

Dear Judge Crotty:

We write to propose a briefing schedule regarding Defendant's Motion to Dismiss. On Monday, December 3, 2018, the Court, advised the parties to confer and submit a briefing schedule by letter, via ECF. The parties have conferred and respectfully request the Court enter the following schedule:

<u>Filing</u>	<u>Due Date</u>
Defendant's Motion to Dismiss	January 4, 2019
Plaintiff's Opposition	February 1, 2019
Defendant's Reply	February 8, 2019

PIERCE BAINBRIDGE BECK PRICE & HECHT LLP

Respectfully submitted,



Christopher N. LaVigne
Adam C. Ludemann
Pierce Bainbridge Beck Price & Hecht LLP
20 West 23rd Street, Fifth Floor
New York, NY 10010
213.262.9333
clavigne@piercebainbridge.com
aludemann@piercebainbridge.com



Roger K. Marion, Esq.
Marion & Allen, P.C.
488 Madison Avenue, Suite 1120
New York, New York 10022
212.658.0350
rmarion@rogermarion.com

Attorneys for Payward, Inc. d/b/a Kraken

Attorney for Robert C. Adler